

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Howard, Paul

Senior Advisor, FDA, Department of Health & Human Services

Date of Appointment: 12/11/2017

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Howard, Paul [electronically signed on 10/16/2017 by Howard, Paul in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Olesh, Stanley, Certifying Official [electronically signed on 03/17/2018 by Olesh, Stanley in Integrity.gov]

Other review conducted by

/s/ Lee, Steven, Ethics Official [electronically signed on 11/08/2017 by Lee, Steven in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 03/17/2018

Data Revised 02/09/2018

Data Revised 01/05/2018

Data Revised 12/05/2017

Data Revised 11/09/2017

Data Revised 11/08/2017

Data Revised 10/31/2017

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(03/17/2018, Olesh, Stanley): 3/5 -- completed working out acceptable procedure regarding Aspen Inst. fellowship -- SO

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Manhattan Institute	New York, New York	Non-Profit	Director and Senior Fellow, Health Policy	6/2006	12/2017
2	Gerson Lehrman Group (GLG)	New York, New York	Corporation	Council Member	5/2015	12/2017
3	Celgene	Summit, New Jersey	Corporation	Judge - Celgene Innovation Impact Award	8/2013	12/2017
4	Aspen Institute	Washington, D.C., District of Columbia	Non-Profit	Health Innovator Fellow	6/2017	Present
5	Pfizer	New York, New York	Corporation	Consultant	12/2015	12/2015
6	Forbes	New York, New York	Corporation	contributing author for newsletter articles	7/2013	12/2017
7	Better Medicare Alliance	Washington, District of Columbia	Non-Profit	Member, Council of Scholars (advisory committee)	5/2016	12/2017

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Manhattan Institute	N/A		Salary/Bonus	\$345,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Gerson Lehrman Group (GLG) (A "membership network for one on one professional learning".)	N/A		Consulting Fees	\$2,480
3	Biotechnology Innovation Organization Board Meeting - June 19, 2017	N/A		Speaking honorarium	\$2,500
4	Wisconsin Association of Health Plans - September 15, 2017	N/A		Speaking honorarium	\$5,000
5	Intelligence Squared Debate - October 13, 2016	N/A		Debate honorarium	\$1,000
6	Merck Conference on Global Drug Pricing Trends - January 25, 2016	N/A		Speaking honorarium	\$2,500
7	Merck conference on U.S. Drug Pricing Trends - March 29, 2016	N/A		Speaking honorarium	\$2,500
8	Unleashing Innovation (Book Chapter) - National Affairs, Inc.	N/A		Writer's fee	\$2,500
9	Encounter Books	N/A		Writer's fee	\$1,250
10	Pfizer Inc	N/A		Consulting fee - Oncology Drug Pricing Environment	\$2,000
11	Manhattan Institute Pension Plan	No			
11.1	Principal Lifetime 2035 R3 Fund	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
11.2	Principal LargeCap S&P 500 Index R3 Fund	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
11.3	Principal MidCap Value I R3 Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
11.4	Principal Income R3 Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
12	Manhattan Institute 403(b)	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.1	Principal LifeTime 2035 R3 Fund	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000
12.2	Principal LargeCap S&P 500 Index R3 Fund	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
12.3	Principal MidCap Value I R3 Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
12.4	Principal Income R3 Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Manhattan Institute for Policy Research Pension Plan	New York, New York	There will be no further contributions to this pension plan after my separation.	2/2001
2	Manhattan Institute for Policy Research 403(B) Deferred Annuity Plan	New York, New York	There will be no further contributions to this pension plan after my separation.	6/2011

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Manhattan Institute	New York, New York	Manhattan Institute – senior fellow and director of health policy for the Manhattan Institute, which includes writing my own op-eds, issue briefs, white papers, and monographs, directing the research of our other health policy team members (in consultation with our senior executive staff), convening health policy working groups of expert stakeholders/academics and hosting public conferences with other experts and policymakers, commissioning independent research for MI publication, and conducting policy briefings for policymakers based on published research materials (books, op-eds, white papers, issue briefs).

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Goldstein Hall PLLC (Law firm.)	N/A		salary	
2	Law Office of Christina Delasi PC (Law firm.)	N/A		legal fees (solo legal practice)	
3	IRA	No			
3.1	JPMorgan U.S. Government Money Market Fund (IJGXX) (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.2	AMG Managers Pictet International Fund (APCTX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.3	iShares MSCI EAFE International Index Fund (BTMKX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.4	Brown Advisory - WMC Strategic European Equity Fund (BAFHX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.5	Causeway International Value Fund (CIVIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.6	Dodge & Cox International Stock Fund (DODFX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.7	Oakmark Fund (OANMX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.8	iShares MSCI Japan ETF (EWJ)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.9	iShares MSCI EAFE ETF (EFA)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.10	JPMorgan US Equity Fund (JUEMX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.11	MFS Massachusetts Investors Trust (MITIX)	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.12	SPDR S&P 500 ETF Trust (SPY)	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
3.13	Vanguard 500 Index Fund (VFIAX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.14	BlackRock High Yield Portfolio (BRHYX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.15	Dodge & Cox Income Fund (DODIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.16	Federated Institutional High-Yield Bond Fund (FIHLX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.17	John Hancock Income Fund (JSTIX)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3.18	JPMorgan Core Bond Fund (WOBDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.19	JPMorgan High Yield Fund (OHYFX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.20	Lord Abbett Short Duration Income Fund (LOLDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.21	PIMCO Investment Grade Corporate Bond Fund (PIGIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.22	PIMCO Total Return Fund (PTTRX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.23	T Rowe Price Emerging Markets Bond Fund (PRXIX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.24	T Rowe Price New Income Fund Inc (PRXEX)	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3.25	Vanguard Total International Bond Index Fund (VTABX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3.26	Vanguard Intermediate-Term Investment-Grade Fund (VFIDX)	Yes	\$1,001 - \$15,000		None (or less than \$201)
3.27	Vanguard Short-Term Bond Index Fund (VBIRX)	Yes	\$15,001 - \$50,000		\$201 - \$1,000

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	U.S. bank account #1 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
2	U.S. bank account #2 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
3	U.S. bank account #3 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
4	U.S. bank account #4 (cash)	N/A	\$1,001 - \$15,000		None (or less than \$201)
5	NY College Savings Plan, Child #1	No			
5.1	Aggressive Growth Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
6	NY College Savings Plan, Child #2	No			
6.1	Aggressive Growth Portfolio	Yes	\$50,001 - \$100,000		None (or less than \$201)
7	AT&T	N/A	\$1,001 - \$15,000		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

None

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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